

I don't agree with this proposal in RM-10867. This proposal fails in many ways. I request the FCC to reject this proposal.

The first failure is the 'automatic upgrade' of No-Code Technician to General. Current Technician test (Element 2 ) does not cover the required theory that the General test (Element 3). Because of this, there may become the possibility of interference upon the already crowded HF bands.

The second failure is the 'over-kill' of reauthorizing the Novice license as an 'Entry-Level' type license. A more easier proposal would be to provide the same HF privileges to the Technician class and upgrading the Novice to Technician. The Novice already has VHF and UHF theory, as well as HF.

The ARRL petition complicates, rather than simplifies, the license structure. The current petition, RM-10868, is a more simplistic and realistic approach compared to this petition.

I request the FCC to reject this proposal.

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